

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MARK L. PEREGUOY

*

Plaintiff

*

v.

*

Civil Action No.:MJG 02 CV 4165

STATE OF MARYLAND, et al.

*

Defendants

* * * * *

STIPULATED MOTION TO FILE RESPONSIVE
PLEADING OUT OF TIME

MARK L. PEREGUOY, Plaintiff, by Ronald R. Hogg, his counsel, moves this Court, with Defendants' State of Maryland, Tregoning, Hardinger and Carroll County, Maryland, consent to permit him to file a responsive pleading out of time, pursuant to Federal Rule of Civil Procedure 6(b)(2), and for reasons, states as follows:

1. Defendants Tregoning and State of Maryland filed a motion entitled Motion to Dismiss, or, In the Alternative, For Summary Judgment on or about April 1, 2003.
2. By applicable Federal Rules, the undersigned is required to file a response within fourteen (14) days.
3. Plaintiff's response is due on or about April 14, 2003.
4. Defendants' Motion is lengthy, extensive and complex. Plaintiff requires additional time to prepare a proper and thoughtful response.
5. This Motion is not for purposes of delay.
6. Undersigned counsel has obtained Defendants' counsel Frank W. Mann, Esquire and John F. Breads, Jr., Esquire's consent to file his responsive pleading on or before

April 23, 2003.

WHEREFORE, it is respectfully requested that the Plaintiff be permitted to file his response pleading on or before April 23, 2003.

984.RRH

/s/

Ronald R. Hogg
Bar No. 08960
4012 College Avenue
Ellicott City, Maryland 21043
(410) 750-2401
Counsel for Plaintiff

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 10th day of April, 2003, a copy of the foregoing Stipulated Motion to File Responsive Pleading Out of Time was mailed via first class mail, postage prepaid, to John F. Breads, Jr., Esquire, 7172 Columbia Gateway Drive, Suite E, Columbia, Maryland 21046 and Frank Mann, Esquire, Assistant Attorney General, Office of the Attorney General, 200 Saint Paul Place, Saint Paul Plaza, Baltimore, Maryland 21202.

/s/
Ronald R. Hogg

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* * * * *

ORDER

The parties having stipulated to an extension of time, IT IS ORDERED: The Plaintiff shall file his response to Defendants' Motion to Dismiss on or before April 23, 2003.

Date

United States District Judge

